

JUN 18 2024

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA)	DOCKET NO. 3:24 CR 128-MOC
)	
)	
v.)	<u>BILL OF INDICTMENT</u>
)	
)	Violations:
1) MARIO ANTONIO CHACON-LANDAVERDE)	21 USC § 846
2) ANSELMO NAVA-SANCHEZ)	21 USC § 841(a)(1)
_____)	

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine)

From in or around May of 2023 and continuing until on or about August 27, 2023, in Gaston County, which is within the Western District of North Carolina, and elsewhere,

- 1) MARIO ANTONIO CHACON-LANDAVERDE**
- 2) ANSELMO NAVA-SANCHEZ**

did knowingly and intentionally combine, conspire, confederate and agree with each other, and others, both known and unknown to the Grand Jury, to distribute and to possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance, and in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that, with respect to the conspiracy offense charged in Count One, 50 grams or more of “actual” methamphetamine, a Schedule II controlled substance, are attributable to, and were reasonably foreseeable by **1) MARIO ANTONIO CHACON-LANDAVERDE** and **2) ANSELMO NAVA-SANCHEZ**. Accordingly, Title 21, United States Code, Section 841(b)(1)(A) is applicable to **1) MARIO ANTONIO CHACON-LANDAVERDE** and **2) ANSELMO NAVA-SANCHEZ**.

In violation of Title 21, United States Code, Section 846.

COUNT TWO

(Distribution of Methamphetamine)

On or about May 13, 2023, in Gaston County, within the Western District of North Carolina,

2) ANSELMO NAVA-SANCHEZ

did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule II controlled substance.

1. Said offense involved at least 50 grams of “actual” methamphetamine.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT THREE

(Distribution of Methamphetamine)

On or about July 6, 2023, in Gaston County, within the Western District of North Carolina,

2) ANSELMO NAVA-SANCHEZ

did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule II controlled substance.

1. Said offense involved at least 50 grams of “actual” methamphetamine.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT FOUR

(Possession with Intent to Distribute Methamphetamine)

On or about August 24, 2023, in Gaston County, within the Western District of North Carolina, and elsewhere,

- 1) MARIO ANTONIO CHACON-LANDAUERDE
2) ANSELMO NAVA-SANCHEZ**

did knowingly and intentionally possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance.

1. Said offense involved at least 50 grams of “actual” methamphetamine.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT FIVE

(Possession with Intent to Distribute Methamphetamine)

On or about August 27, 2023, in Gaston County, within the Western District of North Carolina, and elsewhere,

- 2) ANSELMO NAVA-SANCHEZ**

did knowingly and intentionally possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance.

1. Said offense involved at least 50 grams of “actual” methamphetamine.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

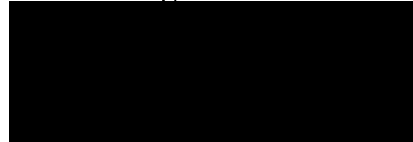
NOTICE OF FORFEITURE

Notice is hereby given of 21 U.S.C. § 853. The following property is subject to forfeiture in accordance with Section 853:

- a. All property which constitutes or is derived from proceeds of the violations set forth in this bill of indictment;
- b. All property used or intended to be used in any manner or part to commit or facilitate such violations; and

- c. If, as set forth in 21 U.S.C. § 853(p), any property described in (a) or (b) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendants to the extent of the value of the property described in (a) and (b).

A TRUE BILL:



FOREPERSON

DENA J. KING
UNITED STATES ATTORNEY

A handwritten signature in black ink, consisting of a large loop followed by a horizontal stroke.

THOMAS KENT
ASSISTANT UNITED STATES ATTORNEY